

# **EXHIBIT A**

David H. Altman, Esq. – ID #039801990  
Allan B. Thompson, Esq. – ID #032662006  
JEFFER, HOPKINSON & VOGEL  
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Hawthorne, New Jersey 07507  
Tel. (973) 423-0100, Fax (973) 423-5614  
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Email: [athompson@jhvlaw.com](mailto:athompson@jhvlaw.com)  
Attorneys for Plaintiff, Peter Reissig

	)	SUPERIOR COURT OF NEW JERSEY
PETER REISSIG, An Individual,	)	SUSSEX COUNTY-LAW DIVISION
	)	
Plaintiff,	)	DOCKET NO.: SSX-L-
	)	
v.	)	
	)	
JPMORGAN CHASE BANK,	)	<i>Civil Action</i>
NATIONAL ASSOCIATION,	)	
t/a CHASE, A Corporation,	)	
	)	
Defendant,	)	
	)	<b>COMPLAINT</b>
	)	
	)	

Plaintiff, Peter Reissig, an individual, by way of complaint against JPMorgan Chase Bank, National Association t/a Chase, says:

### **PARTIES**

1. Peter Reissig is an individual and has an address of 79 Bracken Hill Road, Hamburg, New Jersey.

2. JPMorgan Chase Bank, National Association, t/a Chase (hereinafter “Chase”), is a corporation that, upon information and belief, has a main business address of 1111 Polaris Parkway, Columbus, OH 43240, and a New Jersey agent

address c/o CT Corporation System, 820 Bear Tavern Road, West Trenton, New Jersey 08628.

### **JURISDICTION AND VENUE**

3. The dispute between the parties arises out of business dealings having occurred in the state of New Jersey.

4. Plaintiff has an address in the county of Sussex, state of New Jersey and defendant maintains bank branches in Sussex County.

### **FACTUAL BACKGROUND**

5. On April 27, 2007, by way of warranty deed, individuals by the name of Jacques La Vertue and Caroline Kozah transferred to Peter Reissig and Judy Reissig Unit 102 of Villa D'Este, a condominium complex located at 746 Via Genova, Deerfield Beach, FL 33443. See Exhibit "A", Warranty Deed.

6. On the same date, Peter Reissig and Judy Reissig executed a mortgage with Washington Mutual Bank, FA in relation to Unit 102 of the property (hereinafter the "Unit"). See Exhibit "B", Satisfaction of Mortgage.

7. The mortgage secured a note in the principal sum of \$350,000.00 and secured lender's interest in the Unit. See Exhibit "B", Satisfaction of Mortgage.

8. Upon information and belief, some time prior to October 15, 2009, Chase acquired Washington Mutual Bank FA's interest in the note and mortgage.

9. On October 15, 2009, all obligations under the note and mortgage were satisfied. See Exhibit "B", Satisfaction of Mortgage.

10. On September 12, 2011, by way of warranty deed, Peter Reissig and Judy Reissig transferred the Unit to Judy Reissig. See Exhibit “C”, Warranty Deed.

11. On March 1, 2012, Judy Reissig deeded the Unit to Earl E. Devaney and Judith L. Devaney. See Exhibit “D”, Warranty Deed.

12. Notwithstanding the satisfaction of the mortgage, and transfer of the Unit first from Peter Reissig and Judy Reissig to Judy Reissig, and then from Judy Reissig to Earl E. Devaney and Judith L. Devaney, demands for payment from Chase to Judy Reissig and Peter Reissig continued.

13. Judy Reissig and Peter Reissig unwittingly continued making payments, in accordance with demands from Chase.

14. It is estimated that from 2012 to 2014, \$15,000.00 was paid Chase on behalf of Judy Reissig (now deceased) and plaintiff, and that from, 2015 to the present, over \$55,000.00 was paid.

15. In a recent demand for payment, Chase makes reference to a “line of credit” on a mortgage as the basis for its demand, although that mortgage was cancelled years ago and although the Unit was transferred to a third-party years ago. See Exhibit “E”, Chase Statement.

16. In or around 2023, after the passing of his wife, plaintiff realized that payments to Chase had perhaps been made for years on a long since cancelled mortgage. He therefore made inquiry of Chase.

17. On July 17, 2023, Chase responded to plaintiff's request for information about the "home equity account". See Exhibit "F", communication dated July 17, 2023.

18. Chase wrote that it doesn't "have the Note" so it could not "provide a copy". Ibid.

19. On August 15, 2023, plaintiff wrote again to Chase stating as follows:

Please be advised that I have been in contact with Chase regarding these accounts. This is my second letter for request to obtain the original signed documents.

The enclosed letters from Chase show these documents are not existing.

My deceased wife, Judy Reissig, was the sole owner of the above-mentioned property which she sold in 2012.

She continued paying this Chase account each month not realizing that this was in error and should not have been paid.

The Chase representative I spoke with agreed, no further payments should be made until such time that I am provided with the original requested documents.

Please update your records accordingly to prevent any adverse reflection on my credit score.

See Exhibit "G", letter dated August 15, 2023.

20. Notwithstanding plaintiff's letters and phone conversations with Chase, on August 31, 2023, Chase wrote as follows:

"Please send us a payment right away. . . . We haven't received your mortgage payment(s), so we want to give you information about how to bring your account up to date.

You can avoid additional late fees by making your payment today. If you already sent your payment, please ignore this letter.

See Exhibit “H”, letter dated August 31, 2023.

21. In short, Chase has continued to collect payment, and attempted to collect payment, on a mortgage that was satisfied and cancelled years ago.

22. Plaintiff has made the payments for years at the continuing demands of Chase, prior to discovering the error, and has, due to Chase’s improper demands for payment, suffered damages as a result.

**COUNT ONE**  
**(Violation of Consumer Fraud Act)**

23. Plaintiff incorporates by reference the allegations of the preceding paragraphs of this complaint.

24. Defendant is a person as defined by N.J.S.A. 56:8-1(d).

25. Defendant has engaged in deceptive, abusive, unconscionable, fraudulent, and misrepresentative practices by charging payments to the plaintiff for a mortgage that was satisfied many years ago.

26. Defendant has engaged in deceptive, abusive, unconscionable, fraudulent, and misrepresentative practices by collecting payments for a mortgage that was satisfied many years ago.

27. Defendant has similarly engaged in prohibited conduct by threatening plaintiff to report his failure to tender payment to credit reporting agencies.

28. This was done notwithstanding defendant's own representations that it has no evidence of a loan obligation and that plaintiff should cease making payments.

29. Defendant's conduct as aforesaid constitutes a violation of New Jersey's Consumer Fraud Act.

30. As a direct and proximate result of defendant's conduct as aforesaid plaintiff has suffered damages by paying amounts for years that were never merited or required.

WHEREFORE, the plaintiffs demands judgment against defendant pursuant to N.J.S.A. 56:8-1 et seq. for:

- A. Compensatory damages;
- B. Consequential damages;
- B. Incidental damages;
- C. Attorney's fees;
- D. Treble damages;
- E. Costs of suit;
- F. Punitive damages; and
- E. Any and all additional relief the Court deems equitable and just.

**COUNT TWO**  
**(Unjust Enrichment)**

31. Plaintiff incorporates by reference the allegations of the preceding paragraphs of this Complaint.

32. Chase has been unjustly enriched as a result of demanding and receiving payment on a mortgage that was satisfied years ago.

33. Plaintiff has advanced monies in good faith to which Chase has no legal or factual right or claim.

34. Plaintiff has suffered damages as a result.

WHEREFORE, plaintiff demands judgment against the defendant, for:

- a. compensatory damages;
- b. incidental and consequential damages;
- c. costs;
- d. any and all additional damages the court deems equitable and just.

JEFFER, HOPKINSON & VOGEL  
Attorneys for Plaintiff,  
Peter Reissig

Dated: October 5, 2023

By: /s/ Allan B. Thompson  
ALLAN B. THOMPSON, ESQ.  
For the Firm



**RULE 4:5-1 CERTIFICATION**

Pursuant to Rule 4:5-1, the undersigned, attorney for plaintiff Peter Reissig in the above-captioned matter, hereby certifies that to the best of my knowledge, information and belief, no other action involving the matter in controversy herein is pending or contemplated by the plaintiff. Further, other than the parties set forth in this pleading, we know of no other parties that should be joined in the above action. In addition, we recognized the continuing obligation of each party to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

I certify that confidential identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with R. 1:38-7(b).

Dated: October 5, 2023

/s/ Allan B. Thompson  
ALLAN B. THOMPSON

# Exhibit A

Prepared by and return to:

TRI-COUNTY TITLE, INC.  
2263 NW 2ND AVENUE SUITE 211  
Boca Raton, FL 33431  
561-347-7477  
File Number: TCT-651  
Will Call No.:

[Space Above This Line For Recording Data]

## Warranty Deed

**This Warranty Deed** made this **27th** day of **April, 2007** between **JACQUES LAVERTUE and CAROLINE KOZAH** his wife whose post office address is **4517 CANTERWOOD DRIVE , NE, Ada, MI 49301**, grantor, and **PETER REISSIG and JUDY REISSIG, his wife** whose post office address is **10 LUCCARELLI DRIVE, Holmdel, NJ 07733**, grantee:

(Whenever used herein the terms "grantor" and "grantee" include all the parties to this instrument and the heirs, legal representatives, and assigns of individuals, and the successors and assigns of corporations, trusts and trustees)

**Witnesseth**, that said grantor, for and in consideration of the sum of TEN AND NO/100 DOLLARS (\$10.00) and other good and valuable considerations to said grantor in hand paid by said grantee, the receipt whereof is hereby acknowledged, has granted, bargained, and sold to the said grantee, and grantee's heirs and assigns forever, the following described land, situate, lying and being in **Broward County, Florida** to-wit:

**Unit 102 of VILLA D'ESTE, a Condominium according to the Declaration of Condominium thereof, as recorded in Official Records Book 10143 at Page 916 of the Public Records of Broward County, Florida.**

**Parcel Identification Number: 17234-AD-10200**

**Together** with all the tenements, hereditaments and appurtenances thereto belonging or in anywise appertaining.

**To Have and to Hold**, the same in fee simple forever.

**And** the grantor hereby covenants with said grantee that the grantor is lawfully seized of said land in fee simple; that the grantor has good right and lawful authority to sell and convey said land; that the grantor hereby fully warrants the title to said land and will defend the same against the lawful claims of all persons whomsoever; and that said land is free of all encumbrances, except taxes accruing subsequent to **December 31, 2006**.

DoubleTimes

3

In Witness Whereof, grantor has hereunto set grantor's hand and seal the day and year first above written.

Signed, sealed and delivered in our presence:

Mackenna Tyler  
Witness Name: E. Gleason E. Gleason  
Witness Name: Erin Gleason

JACQUES LAVERTUE (Seal)

Timothy E. Foley  
Witness Name: Timothy E. Foley  
Witness Name: Jon H. Barton

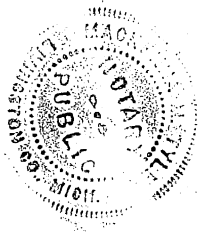
CAROLINE KOZAH (Seal)

State of Michigan  
County of Kent

The foregoing instrument was acknowledged before me this 23rd day of April, 2007 by CAROLINE KOZAH and JACQUES LAVERTUE, who ☒ are personally known or ☐ have produced a driver's license as identification.

[Notary Seal]

Mackenna M. Tyler  
Notary Public  
Printed Name: Mackenna M. Tyler  
My Commission Expires: 11/25/2007



MACKENNA M. TYLER  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF LIVINGSTON  
MY COMMISSION EXPIRES NOV 25, 2007  
ACTING IN COUNTY OF Kent

Thurs

10:00

## CERTIFICATE OF APPROVAL

This is to certify that the transition involving PETER REISSIG AND JUDY REISSIG has been approved by VILLA D'ESTE CONDOMINIUM, INC., regarding the following described property in Broward County, Florida.

Unit No. 102 of VILLA D'ESTE, a Condominium, according to the Declaration thereof, as recorded in Official Records Book 10143, Page 916, of the Public Records of Broward County, Florida, and all amendments thereto.

Address\_746 VIA GENOA, Deerfield Beach, Florida.

Such approval has been given pursuant to the provisions of the Documents and By-Laws of the VILLA D'ESTE CONDOMINIUM, INC.

VILLA D'ESTE CONDOMINIUM, INC.

By

By

OFFICER

All figures and information stated subject to verification. Not responsible for clerical error or omissions.  
Glen Management Services Inc. (Accounting Department) 24 hours prior to closing (561) 392-0977 for  
up to date maintenance payments.

STATE OF FLORIDA                    )  
COUNTY OF BROWARD                )

Before me personally appeared Florance Linden and Walter Wendell to me well known and known to me as the individual described herein and who executed the forgoing instrument as officers of the above named Association, and severally acknowledge to and before me that they executed such instrument as such officers of said Corporation, and that said instrument is the free act and deed of said Corporation.

WITNESS my hand and official seal this 26 day of APRIL 2007



~~NOTARY PUBLIC~~  
STATE OF FLORIDA, AT LARGE

# Exhibit B

**FLORIDA SATISFACTION**

Prepared by/Record and Return To:  
PETER REISSIG  
10 LUCCARELLI DR

HOLMDEL, NJ 07733  
Loan Number: [REDACTED]  
Min:  
MERS Phone, if applicable: 1-888-679-6377  
Outbound Date: 10/05/09

**SATISFACTION OF MORTGAGE**

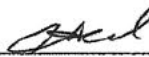
**KNOW ALL MEN BY THESE PRESENTS:** JPMORGAN CHASE BANK, N.A., the Owner and Holder of a certain Mortgage Deed executed by PETER REISSIG AND JUDY REISSIG to WASHINGTON MUTUAL BANK, FA bearing the date of April 27, 2007, recorded May 18, 2007 in Official Records Volume/Book 44064 Page 830 Document 107079242 in the Office of the Clerk of the Circuit Court of BROWARD County, State of Florida, securing a certain note in the principal sum of \$350,000.00 and certain promises and obligations set forth in said Mortgage Deed, upon the property situated in said State and County described as follows, to wit:

Property Address: 746 VIA GENOVA #102, DEERFIELD BEACH, FL 33442

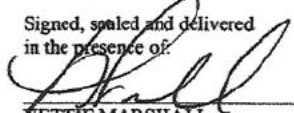

Hereby acknowledges full payment and satisfaction of said Note and Mortgage Deed, and surrenders the same as cancelled, and hereby directs the Clerk of said Circuit Court to cancel the same of record.

In witness whereof JPMORGAN CHASE BANK, N.A. has caused these presents to be executed in its name, and its corporate seal to be hereunto affixed, by its proper officers thereto duly authorized, 10/15/09.

JPMORGAN CHASE BANK, N.A. S/B/M TO WASHINGTON MUTUAL BANK F/K/A  
WASHINGTON MUTUAL BANK, FA

  
ARLETHIA REED  
Vice President

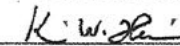
Signed, sealed and delivered  
in the presence of:

  
NETTIE MARSHALL  
  
ALUCISHA MCKEITHEN



State of Louisiana  
Parish/County of: OUACHITA

On this 10/15/09, before me a Notary Public, the undersigned officer, personally appeared ARLETHIA REED, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and did depose and say that he/she executed the same for the entity named and for the purposes therein contained. IN WITNESS WHEREOF, I set my hand and signature which certifies as my seal.

  
KARIN W. HARRIS - 58150  
Notary Public  
LIFETIME COMMISSION



①

**FLORIDA SATISFACTION**

Prepared by/Record and Return To:  
PETER REISSIG  
10 LUCCARELLI DR

HOLMDEL, NJ 07733  
Loan Number: [REDACTED]  
Min:  
MERS Phone, if applicable: 1-888-679-6377  
Outbound Date: 10/05/09

**SATISFACTION OF MORTGAGE**


**KNOW ALL MEN BY THESE PRESENTS:** JPMORGAN CHASE BANK, N.A., the Owner and Holder of a certain Mortgage Deed executed by PETER REISSIG AND JUDY REISSIG to WASHINGTON MUTUAL BANK, FA bearing the date of April 27, 2007, recorded May 18, 2007 in Official Records Volume/Book 44064 Page 830 Document 107079242 in the Office of the Clerk of the Circuit Court of BROWARD County, State of Florida, securing a certain note in the principal sum of \$350,000.00 and certain promises and obligations set forth in said Mortgage Deed, upon the property situated in said State and County described as follows, to wit:

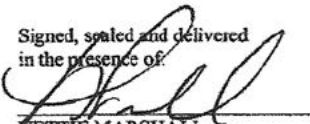
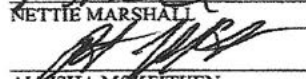
Property Address: 746 VIA GENOVA #102, DEERFIELD BEACH, FL 33442

Hereby acknowledges full payment and satisfaction of said Note and Mortgage Deed, and surrenders the same as cancelled, and hereby directs the Clerk of said Circuit Court to cancel the same of record.

In witness whereof JPMORGAN CHASE BANK, N.A. has caused these presents to be executed in its name, and its corporate seal to be hereunto affixed, by its proper officers thereto duly authorized, 10/15/09.

JPMORGAN CHASE BANK, N.A. S/B/M TO WASHINGTON MUTUAL BANK F/K/A  
WASHINGTON MUTUAL BANK, FA

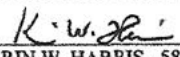
  
ARLETHIA REED  
Vice President

Signed, sealed and delivered  
in the presence of:  
  
NETTIE MARSHALL  
  
ALISHA MCKEITHEN



State of Louisiana  
Parish/County of: OUACHITA

On this 10/15/09, before me a Notary Public, the undersigned officer, personally appeared ARLETHIA REED, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and did depose and say that he/she executed the same for the entity named and for the purposes therein contained. IN WITNESS WHEREOF, I set my hand and signature which certifies as my seal.

  
KARIN W. HARRIS - 58150  
Notary Public  
LIFETIME COMMISSION



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# Exhibit C

DOCUMENT PREPARED BY:  
LAVALLE, BROWN & RONAN, P.A.  
750 South Dixie Highway  
Boca Raton, FL 33432

RETURN DOCUMENT TO:  
LAVALLE, BROWN & RONAN, P.A.  
750 South Dixie Highway  
Boca Raton, FL 33432

Parcel Identification Number 17234-AD-10200

### WARRANTY DEED

**THIS WARRANTY DEED**, made this 12 day of September, 2011, between Peter Reissig and Judy Reissig, his wife, whose address is: 746 Via Genoa, Deerfield Beach, Broward County, Florida 33442, **Grantors**; and Judy Reissig, a married woman, whose post office address is: 746 Via Genoa, Deerfield Beach, Florida 33442, **Grantee**

WITNESSETH, that said Grantors, for and in consideration of the sum of Ten Dollars (\$10.00), and other good and valuable considerations to said Grantors in hand paid by said grantee, the receipt whereof is hereby acknowledged, have granted, bargained and sold to the said grantee, and grantee's heirs and assigns forever, the following described land, situate, lying and being in Broward County, Florida to wit:

Unit 102, of VILLA D'ESTE, a Condominium according to the Declaration of Condominium thereof, as recorded in Official Records Book 10143 at Page 916 of the Public Records of Broward County, Florida.

Parcel Identification Number 17234-AD-10200

Together with all the tenements, hereditaments and appurtenances thereto belonging or in anywise appertaining.

To Have and to Hold, the same in fee simple forever.

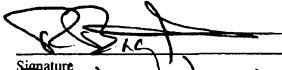
AND the grantors hereby covenant with said grantee that the grantors are lawfully seized of said land in fee simple; that the grantors have good right and lawful authority to sell and convey said

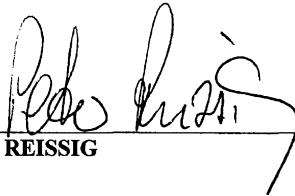
(3)

land; that the grantors hereby fully warrant the title to said land and will defend the same against the lawful claims of all persons whomsoever; and that said land is free of all encumbrances, except taxes accruing subsequent to December 31, 2010.


**In Witness Whereof**, Grantors have hereunto set grantor's hand and seal the day and year first above written.

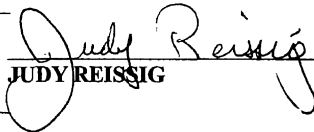
Signed, Sealed and Delivered  
in the Presence of:

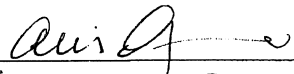
  
\_\_\_\_\_  
Signature  
Richard Bagdasarian  
\_\_\_\_\_  
Print Name

  
\_\_\_\_\_  
PETER REISSIG

  
\_\_\_\_\_  
Signature  
Alison Guerino  
\_\_\_\_\_  
Print Name

  
\_\_\_\_\_  
Signature  
Richard Bagdasarian  
\_\_\_\_\_  
Print Name

  
\_\_\_\_\_  
JUDY REISSIG

  
\_\_\_\_\_  
Signature  
Alison Guerino  
\_\_\_\_\_  
Print Name

STATE OF FLORIDA

COUNTY OF PALM BEACH

The foregoing WARRANTY DEED was acknowledged before me this 12 day of September, 2011, by **PETER REISSIG**, who is personally known or who has produced NT Driver license as identification and who did (did not) take an oath.

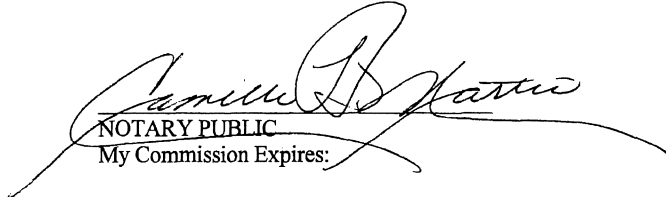
  
NOTARY PUBLIC  
My Commission Expires:



STATE OF FLORIDA

COUNTY OF PALM BEACH

The foregoing instrument was acknowledged before me this 12<sup>th</sup> day of September, 2011, by **JUDY REISSIG**, who is personally known or who has produced Florida Driver license as identification and who did (did not) take an oath.

  
NOTARY PUBLIC  
My Commission Expires:



# Exhibit D

**Tri-County Title, Inc.**  
**2298 NW 2nd Avenue Suite 15**  
**Boca Raton, FL 33431**

[Space Above This Line For Recording Data]

**This Warranty Deed** made this 1st day of March, 2012 between JUDY REISSIG, a married woman whose post office address is 746 Via Genova, Deerfield Beach, FL 33442, grantor, and EARL E. DEVANEY and JUDITH L. DEVANEY, his wife, whose post office address is 4821 Montgomery Lane #503, Bethesda, MD 20814, grantees:

**Witnesseth**, that said grantor, for and in consideration of the sum of TEN AND NO/100 DOLLARS (\$10.00) and other good and valuable considerations to said grantor in hand paid by said grantee, the receipt whereof is hereby acknowledged, has granted, bargained, and sold to the said grantee, and grantee's heirs and assigns forever, the following described land, situate, lying and being in **Broward County, Florida** to-wit:

**Parcel Identification Number: 474234-AD-1020**

**Together** with all the tenements, hereditaments and appurtenances thereto belonging or in anywise appertaining.

**And** the grantor hereby covenants with said grantee that the grantor is lawfully seized of said land in fee simple; that the grantor has good right and lawful authority to sell and convey said land; that the grantor hereby fully warrants the title to said land and will defend the same against the lawful claims of all persons whomsoever; and that said land is free of all encumbrances, except taxes accruing subsequent to **December 31, 2011**.

~~Signed, sealed and delivered in our presence:~~

Witness Name: Richard S. Rus

JUDY REISSIG

(Seal)

### DoubleTimes

State of Florida  
County of Broward

The foregoing instrument was acknowledged before me this 1st day of March, 2012 by JUDY REISSIG, who ☒ is personally known or ☐ has produced a driver's license as identification.

[Notary Seal]

Notary Public

Printed Name: Penny Myles Sheehan

My Commission Expires: \_\_\_\_\_





CERTIFICATE OF APPROVAL

VILLA D'ESTE CONDOMINIUM, INC. certifies that **Earl & Judith Devaney** have been approved by the Board of Directors of Villa D'Este as the Purchaser of the following described real property located at:

Address: **746 Via Genova, Deerfield Beach, FL 33442**

This approval is dated January 2<sup>nd</sup>, 2012

By: Florence Linden

Title: President

All Rules and Regulations are enforced. We appreciate your compliance.

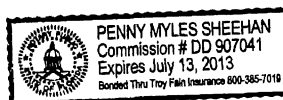
VILLA D'ESTE CONDOMINIUM, INC.

State of Florida )  
County of Broward)

BEFORE ME personally appeared FLORENCE LINDEN and executed the foregoing Certificate of Approval for the purposed therein expressed and acknowledged before me that they executed the same.

WITNESS my hand and official seal in the County and State last aforesaid this  
2 day of JANUARY, 2012

[Signature]  
Notary Public



# Exhibit E

700 Kansas Lane  
 LA4-6633  
 Monroe, LA 71203



Thank you for your payment of  
 \$961.40 on 04/19/2023.

Statement Period  
 04/02/2023 - 05/02/2023

Minimum Payment Due Date	Minimum Payment Due
05/27/2023	\$1,013.37



00449 WQD Z 12223 D - BR2  
 PETER REISSIG  
 JUDY REISSIG  
 79 BRACKEN HILL RD  
 HAMBURG NJ 07419-1287

*Pris 5/19/23*

A late fee of \$50.67 may apply if payment received after  
 06/11/2023.



### Line of credit information

Account number [REDACTED]  
 Property address 746 Via Genova 102  
 Deerfield Beach, FL 33442  
 Unpaid principal balance<sup>1</sup> \$134,063.33  
 Credit line \$134,773.00  
 Available for use \$0.00  
 Interest Rate 8.90000%  
 Principal paid year to date \$0.00  
 Interest paid year to date \$3,740.00  
 Maturity date 05/2037

### Account summary

Previous balance \$135,024.73  
 Payments/credits \$961.40  
 Other credits/debits \$0.00  
 Fees chrgd/advances \$0.00  
 Interest charged \$1,013.37  
 New balance<sup>1</sup> \$135,076.70  
 Escrow payment \$0.00

### Explanation of amount due

Principal	\$0.00
Finance charges	\$1,013.37
<b>Total amount due on 05/27/2023</b>	<b>\$1,013.37</b>

### Access your account on the go



Download the Chase  
 Mobile® app<sup>1</sup> Visit  
[www.chase.com/Mobile](http://www.chase.com/Mobile) to  
 find out more.

<sup>1</sup>Chase Mobile® app is available for select mobile  
 devices. Enroll in Chase Online™ and download the  
 Chase Mobile® app. There is no charge from Chase,  
 but message and data rates may apply.

### Keep up to date



Visit [www.chase.com/Alerts](http://www.chase.com/Alerts) to  
 set up Chase account alerts.

### Ways to pay

Convenient and free ways to make your payment:

- Enroll in automatic payments at [www.chase.com](http://www.chase.com) or  
 back of statement coupon.
- Make your payment at [www.chase.com](http://www.chase.com)
- Pay by phone with our dedicated number at  
**1-833-PAY-CHASE (1-833-729-2427)**.
- Mail your payment with the coupon below.

### Resources



[www.chase.com/MyHomeEquity](http://www.chase.com/MyHomeEquity)



Call customer service 1-800-836-5656  
 (24/7 automated line)  
 Monday - Friday 8 a.m. - 8 p.m. (ET)  
 Saturday 9 a.m. - 6 p.m. (ET)



Si tiene alguna pregunta o necesita ayuda para traducirla,  
 comuníquese con nosotros llamando al 1-855-280-4198 o  
 visita [www.chase.com/Statement](http://www.chase.com/Statement)

Mail your payment with the coupon below

**Transaction activity**

Transaction date	Description	Total received	Principal	Interest	Escrow	Fees/ Advances	Unapplied funds
04/19/2023	PAYMENT <i>Revolving</i>	\$0.00		\$961.40			
04/19/2023	FUNDS APPLIED <i>Revolving</i>	\$961.40					

**Additional information**

If you or any occupant of your home are or recently were on active Military duty or related active service, you may be eligible for benefits and protections under the federal Servicemembers Civil Relief Act (SCRA), state law, or Chase policy. These benefits and protections may include protection from foreclosure or eviction without a court order, and in some cases, interest rate and fee benefits. Some protections also may be available if you are the dependent of an eligible Servicemember. In addition, some state laws may allow Servicemembers to request a payment deferral.

For more information, please call Chase Military Services at 1-877-469-0110.

**Finance charge calculations**

Type of balance	Dates	Days in billing cycle	Annual percentage rate (APR)	Daily periodic rate	Balance subject to interest rate	Finance charges
Purchases, Balance Transfers, Cash Advances - <i>Revolving</i>	04/02/2023 - 05/02/2023	31	8.90000%	0.0243836%	\$134,063.33	\$1,013.37



122509800102100449000200000000



0000002 1860-14C1P 230502 Page 2 of 2 00449



# Exhibit F

700 Kansas Lane  
Monroe, LA 71203



July 17, 2023

000552 - 1 of 1 NSP0IF1A-Z1 000000000000

Peter Reissig  
Judy Reissig  
79 Bracken Hill Road  
Hamburg, NJ 07419-1287



158404702300100552000100000000

**We don't have the document(s) you requested**

Account: [REDACTED]  
Property Address: 746 Via Genova 102  
Deerfield Beach, FL 33442-0000

Dear Peter Reissig and Judy Reissig:

Thank you for your request for information about this home equity account.

We don't have the Note, so we cannot provide a copy as you requested.

If you have questions, please call us; we accept operator relay calls.

Sincerely,

Steve Brooks  
Executive Director  
Chase  
1-800-836-5656  
chase.com

Esta comunicación contiene información importante acerca de la cuenta. Si tiene alguna pregunta o necesita ayuda para traducirla, comuníquese con nosotros llamando al 1-855-280-4198.

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CC094

# Exhibit G



Klaus P. Reissig  
79 Bracken Hill Rd.  
Hamburg, NJ 07419

August 15, 2023

Chase  
700 Kansas Lane  
Monroe, LA 71203

Reg: Loan # [REDACTED]-Account [REDACTED]

Property- 746 Via Genova, Deerfield Beach, Florida 33442

To Whom It May Concern:

Please be advised that I have been in contact with Chase regarding these accounts. This is my second letter for request to obtain the original signed documents.

The enclosed letters from Chase show these documents are not existing.

My deceased wife, Judy Reissig, was the sole owner of the above-mentioned property which she sold in 2012.

She continued paying this Chase account each month not realizing that this was in error and should not have been paid.

The Chase representative I spoke with agreed, no further payments should be made until such time that I am provided with the original requested documents.

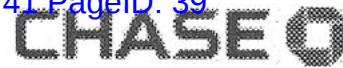
Please update your records accordingly to prevent any adverse reflection on my credit score.

Sincerely,

Klaus P. Reissig

# Exhibit H

Chase  
720 S. Colorado Blvd., Suite 210  
Glendale, CO 80246-1904



August 31, 2023

000225 - 1 of 3 NSP01F1A-Z1 000000000000

Peter Reissig  
Judy Reissig  
79 Bracken Hill Road  
Hamburg, NJ 07419-1287



24340470170010022500010000000000

**Please send us a payment right away**

Account: [REDACTED]  
Property Address: 746 Via Genova 102  
Deerfield Beach, FL 33442-0000

Dear Peter Reissig and Judy Reissig:

We haven't received your mortgage payment(s), so we want to give you information about how to bring your account up to date.

You can avoid additional late fees by making your payment today. If you already sent your payment, please ignore this letter.

**Here's how to make a payment**

The following options are free and convenient ways to pay:

- Sign in to your account at [chase.com](https://chase.com).
- Call our automated system at 1-800-848-9380.
- Visit a Chase branch.

If you would like to mail your payment, please write your account number on it and send it to:

Overnight Mail: Chase  
3137 East Elwood St.  
Attn: P.O. Box 78420, Suite 130  
Phoenix, AZ 85034

Regular Mail: Chase  
P.O. Box 78420  
Phoenix, AZ 85062-8420

For more information about your payment options, visit [chase.com/WaysToPay](https://chase.com/WaysToPay).

**Mortgage assistance options may be available if you need help**

If you're having trouble making payments, we're here to help. We may have mortgage assistance options for your situation. To see the options that may be available or to discuss your options, you can:

- Visit [chase.com/MortgageAssistance](https://chase.com/MortgageAssistance) and apply for help, or
- Call us at 1-800-848-9380.

**Here's how to find counseling resources**

The U.S. Department of Housing and Urban Development (HUD) has an approved list of housing

- Call HUD at 1-800-569-4287, or 1-800-877-8339 for TTY services.
- Visit [hud.gov](http://hud.gov), and go to the "Resources" tab to select "Foreclosure Avoidance Counseling."

You can also call 1-888-995-HOPE (1-888-995-4673) for additional counseling resources.

Housing counselors at these agencies are trained to help homeowners who are having problems making their mortgage payments. Counselors can help you find the best option for your situation and they will:

- Work with you in person or over the phone.
- Help you understand your housing options.
- Help communicate with your lender.
- Recommend financial tools to help you solve current problems and avoid future ones.
- Connect you with local resources that may provide additional assistance.

#### **New York City Residents**

New York City consumer regulations require us to request your language preference. If you have not already done so, please advise us of your language preference by calling us at 1-800-848-9380 or writing us at Chase, P.O. Box 469030, Glendale, CO 80246-9030. Please note that most written communications will only be available in English. Limited written communications will be available in Spanish.

You can send us a Notice of Error, Information Request or Qualified Written Request as part of the Real Estate Settlement Procedures Act to ask for information or to dispute errors about the servicing of your mortgage loan.

To do so, send us a separate letter that describes the issue and include any supporting documents. Please mail it to our exclusive address for the receipt and handling of these requests:

Mail: Chase  
Mail Code LA4-6911  
700 Kansas Lane  
Monroe, LA 71203-4774

**Please note:** We can provide you with Chase letters, including this letter, in alternative formats such as large print (18 and 22 point font), braille and audio compact disc. To request letters in an alternative format, please call 1-800-848-9380, visit a Chase branch location or write to us at:

Mail: Chase  
Mail Code LA4-5555  
700 Kansas Lane  
Monroe, LA 71203-4774

If you have questions, please call us. We're here to help Monday through Friday from 8 a.m. to 10 p.m., and Saturday from 8 a.m. to 5 p.m. Eastern Time.

Sincerely,

Chase  
1-800-848-9380; we accept operator relay calls  
[chase.com](http://chase.com)

Enclosed:  
- Servicemembers Civil Relief Act Notice

Esta comunicación contiene información importante acerca de la cuenta. Si tiene alguna pregunta o necesita ayuda para traducirla, comuníquese con nosotros llamando al 1-800-848-9380, de lunes a viernes de 8 a.m. a 10 p.m. y sábados de 8 a.m. a 5 p.m., hora del Este.

You may have the ability to apply for the Department of Treasury's Homeowner Assistance Fund (HAF), if HAF is available in your jurisdiction. If your state or jurisdiction offers HAF programs, you may contact those programs directly for more information, including how to apply.



**We are a debt collector**

This is an attempt to collect a debt and any information obtained will be used for that purpose. However, to the extent your original obligation is subject to the automatic stay of bankruptcy or was discharged under the United States Bankruptcy Code, this notice is for compliance with non-bankruptcy law and/or informational purposes only and does not constitute an attempt to collect a debt or to impose personal liability for such obligation. Nothing in this notice means that you're required to repay a debt that's subject to the automatic stay or has been discharged. Any payment you make on the account is voluntary, but if the original obligation is secured by collateral, we retain the rights under any applicable security instrument.

If you are represented by an attorney, please refer this letter to your attorney and provide us with the attorney's name, address, and telephone number.

You can call the U.S. Department of Housing and Urban Development at 1-800-569-4287 or the HPF Homeowner's HOPE Hotline at 888-995-HOPE (4673) to get free assistance. You can also find a nonprofit HUD-approved counselor who can provide the information and assistance you may need to avoid foreclosure by using the search tool at [hud.gov/offices/hsg/sfh/hcc/fc/](https://hud.gov/offices/hsg/sfh/hcc/fc/). The HUD-approved housing counseling agencies found on HUD.gov can also help you with your household budgeting at no charge.

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**Servicemembers Civil Relief  
Act Notice Disclosure**

**U.S. Department of Housing  
and Urban Development  
Office of Housing**

**OMB Approval No. 2502-  
0584  
Expire 11/30/2024**

**Legal Rights and Protections Under the SCRA**

Servicemembers on "active duty" or "active service," or a spouse or dependent of such a servicemember may be entitled to certain legal protections and debt relief pursuant to the Servicemembers Civil Relief Act (50 USC §§ 39014043) (SCRA).

**Who May Be Entitled to Legal Protections Under the SCRA?**

- Regular members of the U.S. Armed Forces (Army, Navy, Air Force, Marine Corps and Coast Guard).
- Reserve and National Guard personnel who have been activated and are on Federal active duty.
- National Guard personnel under a call or order to active duty for more than 30 consecutive days under section 502(f) of title 32, United States Code, for purposes of responding to a national emergency declared by the President and supported by Federal funds.
- Active service members of the commissioned corps of the Public Health Service and the National Oceanic and Atmospheric Administration.
- Certain United States citizens serving with the armed forces of a nation with which the United States is allied in the prosecution of a war or military action.

**What Legal Protections Are Servicemembers Entitled To Under the SCRA?**

- The SCRA states that a debt incurred by a servicemember, or servicemember and spouse jointly, prior to entering military service shall not bear interest at a rate above 6 % during the period of military service and one year thereafter, in the case of an obligation or liability consisting of a mortgage, trust deed, or other security in the nature of a mortgage, or during the period of military service in the case of any other obligation or liability.
- The SCRA states that in a legal action to enforce a debt against real estate that is filed during, or within one year after the servicemember's military service, a court may stop the proceedings for a period of time, or adjust the debt. In addition, the sale, foreclosure, or seizure of real estate shall not be valid if it occurs during or within one year after the servicemember's military service unless the creditor has obtained a valid court order approving the sale, foreclosure, or seizure of the real estate.
- The SCRA contains many other protections besides those applicable to home loans.

**How Does A Servicemember or Dependent Request Relief Under the SCRA?**

- In order to request relief under the SCRA from loans with interest rates above 6% a servicemember or spouse must provide a written request to the lender, together with a copy of the servicemember's military orders.

Call Chase Military Services toll-free at 1-877-469-0110, or send your information to:

Chase  
Attn: SCRA Request  
P.O. Box 183240  
Columbus, OH 43218-3240



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- There is no requirement under the SCRA, however, for a servicemember to provide a written notice or a copy of a servicemember's military orders to the lender in connection with a foreclosure or other debt enforcement action against real estate. Under these circumstances, lenders should inquire about the military status of a person by searching the Department of Defense's Defense Manpower Data Center's website, contacting the servicemember, and examining their files for indicia of military service. Although there is no requirement for servicemembers to alert the lender of their military status in these situations, it still is a good idea for the servicemember to do so.

#### **How Does a Servicemember or Dependent Obtain Information About the SCRA?**

- Servicemembers and dependents with questions about the SCRA should contact their unit's Judge Advocate, or their installation's Legal Assistance Officer. A military legal assistance office locator for all branches of the Armed Forces is available at <https://legalassistance.law.af.mil/>
- "Military OneSource" is the U. S. Department of Defense's information resource. If you are listed as entitled to legal protections under the SCRA (see above), please go to [www.militaryonesource.mil/legal](http://www.militaryonesource.mil/legal) or call (800) 342-9647 (toll free from the United States) to find out more information. Dialing instructions for areas outside the United States are provided on the website.

form HUD-92070  
(6/2017)

## Civil Case Information Statement

### Case Details: SUSSEX | Civil Part Docket# L-000418-23

**Case Caption:** REISSIG PETER VS JPMORGAN CHASE

BANK,

**Case Initiation Date:** 10/05/2023

**Attorney Name:** DAVID H ALTMAN

**Firm Name:** JEFFER HOPKINSON & VOGEL

**Address:** 1600 ROUTE 208 NORTH BOX 507

HAWTHORNE NJ 07507

**Phone:** 9734230100

**Name of Party:** PLAINTIFF : REISSIG, PETER

**Name of Defendant's Primary Insurance Company**

(if known): None

**Case Type:** CONTRACT/COMMERCIAL TRANSACTION

**Document Type:** Complaint

**Jury Demand:** NONE

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**Does this case involve claims related to COVID-19?** NO

**Are sexual abuse claims alleged by:** PETER REISSIG? NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category:** Putative Class Action? NO Title 59? NO Consumer Fraud? YES

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

10/05/2023

Dated

/s/ DAVID H ALTMAN

Signed



